

hendersonPARKS

The Marquette Building
140 South Dearborn Street | Suite 1020 | Chicago, IL 60603
T 312.262.2900 | F 312.262.2901
Henderson Parks, LLC | www.henderson-parks.com

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Victor P. Henderson
(312) 262-2903

vphenderson@henderson-parks.com

MEMO ENDORSED

October 19, 2023

Honorable Valerie E. Caproni
Thurgood Marshall
United States Courthouse
40 Foley Square, Courtroom 443
New York, NY 10007

Re: *United States v. Williams, et al.*, 21-CR-603 (6) (VEC)

Your Honor:

We are writing to request that William Bynum's appearance be excused for Friday, October 20, 2023 and on Monday, October 23, 2023. The attorneys for Mr. Bynum are *not* asking that their appearance be excused. The man that played a significant, and maybe the most significant, role in raising Mr. Bynum, Jameel Ghauri, died on Wednesday October 18, 2023. Mr. Ghauri lived and died in Racine, Wisconsin, not far from where Mr. Bynum resides in Illinois. Mr. Bynum lived with Jameel Ghauri and the Ghauri family during various summers while Mr. Bynum was in high school and at other times too. Mr. Bynum is actively involved in planning the funeral and is requesting permission to attend the service; the funeral is scheduled for Monday, October 23, 2023. The Government takes no position as to whether Mr. Bynum should be excused from the Final Pretrial Conference on Friday the 20th as that meeting concerns legal issues. With respect to jury selection, which is scheduled for Monday the 23rd, the Government believes that Mr. Bynum needs to be allocuted to confirm that he is knowingly and voluntarily waiving his right to appear at and participate in jury selection. (See Fed. R. Crim P. 43(c)(2).) Absent such an allocution, the Government opposes the Defendant's request.

Yours truly,

HENDERSON PARKS, LLC

Victor P. Henderson/sj
Victor P. Henderson

VPH/sj

Mr. Bynum is ordered to appear for the final pretrial conference scheduled for Friday, October 20, 2023, at 11:30 A.M. The Court will discuss Mr. Bynum's request to be excused from jury selection so that he may attend Mr. Ghauri's funeral at the final pretrial conference.

SO ORDERED.

Valerie Caproni

10/19/2023

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE